

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA

2006 AUG 30 A 9:34

DEBRA P. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

ALS#
139858
Christopher Pridmore
Full name and prison number
of plaintiff(s)

v.
Ms. Gwendolyn Mosley
Health Care Unit
Dr. Darbouze M.D.
Commissioner Richard Allen

CIVIL ACTION NO. 2:06-cv-118-MEF
(To be supplied by Clerk of
U.S. District Court)

Name of person(s) who violated
your constitutional rights.
(List the names of all the
persons.)

* I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court
dealing with the same or similar facts involved in this
action? YES () NO (X)
- B. Have you begun other lawsuits in state or federal court
relating to your imprisonment? YES () NO (X)
- C. If your answer to A or B is yes, describe each lawsuit
in the space below. (If there is more than one lawsuit,
describe the additional lawsuits on another piece of
paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s) _____

Defendant(s) _____

2. Court (if federal court, name the district; if
state court, name the county) _____

3. Docket number _____
4. Name of judge to whom case was assigned _____
5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) _____
6. Approximate date of filing lawsuit _____
7. Approximate date of disposition _____

II. PLACE OF PRESENT CONFINEMENT Easterling
Correctional Facility
 PLACE OR INSTITUTION WHERE INCIDENT OCCURRED Easterling
Correctional Facility

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

NAME	ADDRESS
1. <u>Ms. Gwendolyn Mosley</u>	<u>200 Wallace Drive</u> <u>Clio, Ala. 36017</u>
2. <u>Health Care Unit</u>	<u>Prison Health Services, 105 W. Park</u> <u>Drive, Brentwood, Tenn. 37027</u>
3. <u>Dr. Darbouze</u> <u>Dr. [unclear]</u>	<u>200 Wallace Drive</u> <u>Clio, Ala. 36017</u>
4. <u>Commissioner Richard Allen</u>	<u>P.O. Box 301501</u> <u>Montgomery, Ala. 36130</u>
5. <u>Ms. Kay Wilson R.N.</u>	<u>200 Wallace Drive</u> <u>Clio, Alabama 36017</u>
6. _____	_____

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED 8/8/06
August 8th, 2006

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: Civil Rights, 42 U.S.C. 1983 Charge of
deliberate indifference by prison authorities to
prisoner's request for essential medical treatment
is sufficient to state claim for relief. 42 U.S.C.A.
§ 1983

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

Upon August 8th, 2006 I was seen by Dr. Banajee
for my left knee and bottom bed profile due to
being over 40 and diabetic with insulin dependant.
I told the doctor that I was having dizzy spells

and excessive use of the bathroom which was giving me
trouble getting up and down on my bed. Dr. refused request
 GROUND TWO: Mansfield, Circuit Judge: [7, 9] However a change
of deliberate indifference by prison authorities to a prisoner's
right for essential medical treatment is sufficient to state
a claim. Martinez v Mancusi, 443 F.2d, 921 (2nd Cir. 1970)

SUPPORTING FACTS: according to website WWW.diabetic.com/
education. Diabetics are suppose to use a non soap
cleanser formulated for sensitive skin. Which Eucerin
Gentle Hydrating cleanser is a known brand but it is
not available on the store or offered by the Health
Care for diabetics who are indigent but instead
all thats offered is ordinary soap on the store
or state soap if you have no money and both
choices dries out your skin and cause's damage in health.

GROUND THREE: (6) Prisons Key 4, Prisoners no less than other
persons have constitutional right of access
to courts, and prison authorities may neither place burdens
on such right, nor punish its exercise 42 U.S.C.A. § 1983.

SUPPORTING FACTS: In this institution you have to
fill out a request slip to get permission to use
the law library. Then the library has limited
space with no tables to work. Only two typewriters,
you have to sign for paper and envelopes. You may
get in two hours a week if lucky because
there's no regular hours or enough space for
the amount of inmates who need access
to the courts.

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU.
MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

I want to be placed in a camp to where I
can get the proper medical care and the
proper access to law materials such as
Hamilton A+I or Ventress. also make these things
be corrected at this institutions

Christopher Pridmore (139858)
Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true
and correct.

EXECUTED on August 23, 2006
(Date)

Christopher Pridmore (139858)
Signature of plaintiff(s)